

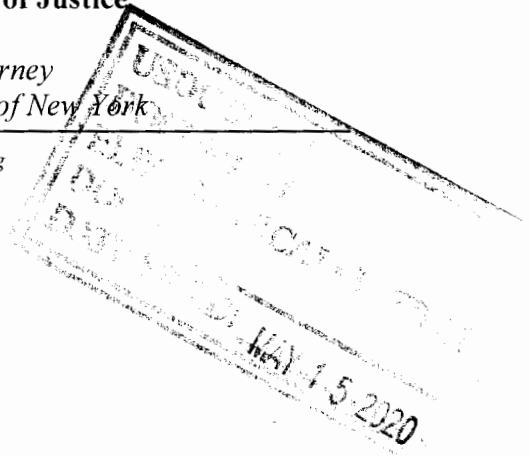


U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

May 15, 2020



By CM/ECF

Honorable George B. Daniels
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: *United States v. Doud*,
19 Cr. 285 (GBD)**

SO ORDERED:

George B. Daniels
George B. Daniels, U.S.D.J.

Dated: MAY 15 2020

Dear Judge Daniels:

In light of the adjournment of the trial date in the above-captioned case from June 29, 2020 to September 14, 2020, the parties respectfully propose the following adjusted schedule for pretrial filings and deadlines. The parties make this proposal jointly.

- July 14: Defense to produce any unproduced Rule 16 materials in its possession as of that date
- July 14: Government to provide defense with list of co-conspirators
- July 21: Government to provide Rule 404(b) notice
- July 28: Government to provide expert disclosure(s)
- August 11: Parties to submit proposed requests to charge and voir dire
- August 18: Government to provide its witness list
- August 18: Government to provide its exhibit list
- August 18: Government to provide Jencks Act material
- August 20: Parties to file motions *in limine*
- August 25: Defense to provide expert disclosure(s)

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May 15, 2020

- August 27: Parties to file oppositions to motions *in limine*
- September 1: Defense to provide witness list
- September 1: Defense to provide Rule 26.2 disclosures

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

By: /s/
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